

IN THE LAPORTE CIRCUIT COURT
CAUSE NO. 46C01-0007-PL-231

IN CLERK'S OFFICE
JUN 27
CLERK OF U.S. DISTRICT COURT

3. The Defendant, David Schoettlin, individually and doing business as DocumentProfessionals.com, is an individual engaged in the sale of imitation high school and university diplomas and transcripts to consumers via the Internet from his principal place of business, located in LaPorte County, at 4238 West Dunes Highway, Michigan City, Indiana, 46360 and P.O. Box 2140, Michigan City, Indiana, 46361.

FACTS

4. At all relevant times, the Defendants have maintained internet websites, including www.DiplomasAndMore.com and www.DocumentProfessionals.com, offering for sale to the public imitation diplomas and/or transcripts.

5. Upon information and belief, the Defendant, Michael J. Everett, is the owner of 1rst Step Web Design and operates the servers for the Defendants' websites, www.DiplomasAndMore.com and www.DocumentProfessionals.com.

6. Upon information and belief, the Defendants, Michael J. Everett and David Schoettlin, have jointly operated several websites, including www.DiplomasAndMore.com and www.DocumentProfessionals.com, and have acted in concert to commit the deceptive acts complained of herein.

7. When, in this Complaint, reference is made to any act of the Defendants, such allegations shall be deemed to mean the principals, agents, representatives, or employees of the Defendants did or authorized such acts to be done while actively engaged in the management, direction, or control of the affairs of Defendants and while acting within the scope of their duties, employment, or agency for the benefit of the Defendants.

A. Allegations Involving Michael J. Everett and www.DiplomasAndMore.com.

8. The Defendant, Michael J. Everett, through his website, www.DiplomasAndMore.com, offers consumers, “the most authentic degrees available today” and “many different types of novelty diplomas and certificates. Some of them are: Associate’s, Bachelor’s, Master’s, PhD’s, High School Diplomas, GED’s, Home School Diplomas, and many types of certificates.”

9. On or about February 14, 2006, an investigator with the Indiana Attorney General’s Office placed an order for a Master of Business Administration degree (“MBA”) from the Defendant, Michael J. Everett’s, website at a total cost of Sixty-Four Dollars and Ninety-Five Cents (\$64.95), which was paid.

10. On or about February 20, 2006, the investigator received a diploma from the Defendant, Michael J. Everett, which purported to be an MBA from Indiana University. Attached and incorporated by reference as Exhibit “A” is a true and accurate copy of the diploma.

11. The diploma created and sold by the Defendant, Michael J. Everett, included the Indiana University name, what purported to be the “Official Seal” of Indiana University, and forged signatures of purported University officials.

12. Indiana University has not authorized the Defendant, Michael J. Everett, to use the Indiana University name, the Indiana University “Official Seal”, or signatures of any purported university officials on the diploma.

B. Allegations involving David A. Schoettlin and www.DocumentProfessionals.com.

13. The Defendant, David A. Schoettlin, through his website, www.DocumentProfessionals.com, offers, “the most realistic Fake Diplomas money can buy!”

14. The Defendant, David A. Schoettlin, also emphasizes the realism of his documents, stating the “fake diplomas are printed on the same type diploma paper that the schools use. You will be amazed at the quality of our fake college degrees. You may also add transcripts to your fake diploma order.” and “You can also choose the grade point average that will appear on your fake transcripts. You will not find a better fake diploma package anywhere!”

15. On or about January 11, 2007, an investigator with the Indiana Attorney General’s Office placed an order for a Master of Business Administration degree (“MBA”) from the Defendant, David A. Schoettlin’s, website at a total cost of One Hundred and Seventy-Five Dollars and Eighty-Five Cents (\$175.85), which was paid.

16. On or about January 17, 2007, the investigator received a diploma from the Defendant, David A. Schoettlin, which purported to be an MBA from Indiana University. Attached and incorporated by reference as Exhibit “B” is a true and accurate copy of the diploma.

17. On or about February 1, 2007, the investigator placed an order for a transcript to accompany his MBA from the Defendant, David A. Schoettlin’s, website at a total cost of Eighty Dollars and Fifty-One Cents (\$80.51), which was paid.

18. On or about February 3, 2007, the investigator received a transcript from the Defendant, David A. Schoettlin, which purported to be from Indiana University. Attached and incorporated by reference as Exhibit “C” is a true and accurate copy of the transcript.

19. The diploma created and sold by the Defendant, David A. Schoettlin, was housed in a black leatherette case embossed with “Indiana University – Kelly [sic] School of Business” in gold lettering. The actual diploma included the Indiana University name, as well as “Kelly [sic] School of Business” and what purported to be the “University Seal” of Indiana University embossed on the diploma, and forged signatures of purported University officials.

20. The transcript created and sold by the Defendant included the Indiana University name, as well as “Kelly [sic] School of Business.” The transcript also included an embossed seal and the name and signature of Mary P. Wesley, who is purported to be the Registrar.

21. Indiana University has not authorized the Defendant to use the Indiana University name, the Kelley School of Business name, the Indiana University “University Seal”, or signatures of any purported university officials on the diploma or transcript.

COUNT I – VIOLATIONS OF THE DECEPTIVE CONSUMER SALES ACT

22. The Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1 through 21 above.

23. The transaction referred to in paragraph 9, 15, and 17 are “consumer transactions” as defined by Ind. Code § 24-5-0.5-2(a)(1).

24. The Defendants are “suppliers” as defined by Ind. Code § 24-5-0.5-2(a)(3).

25. The Defendants’ manufacture and sale of purported Indiana University diplomas and a transcript to the Indiana Attorney General’s Office, when the Defendants knew or reasonably should have known they had not received approval to sell the diplomas and transcript, is a violation of the Indiana Deceptive Consumer Sales Act, Ind. Code § 24-5-0.5-3(a)(1).

26. By manufacturing and creating university diplomas and transcripts, including but not limited to the purported Indiana University diplomas and transcript referenced in paragraphs 10, 16, and 18 above, which are designed to give the appearance of being authentic, the Defendants represent the subject of a consumer transaction has benefits and characteristics which they know or should reasonably know it does not have, in violation of Ind. Code § 24-5-0.5-3(a)(1), the subject of a consumer transaction is of a particular standard or quality which it is not, and which the Defendants know or should reasonably know it is not, in violation of Ind. Code § 24-5-0.5-3(a)(2), and they have a sponsorship, approval, or affiliation in such consumer transaction, if they do not and the Defendants know or should reasonably they do not have such, in violation of Ind. Code § 24-5-0.5-3(a)(7).

**COUNT II – KNOWING AND INTENTIONAL VIOLATIONS OF
THE DECEPTIVE CONSUMER SALES ACT**

27. The Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1 through 26 above.

28. The misrepresentations and deceptive acts set forth above were committed by the Defendants with the knowledge and intent to deceive.

RELIEF

WHEREFORE, the Plaintiff, State of Indiana, requests the Court enter judgment against the Defendants, Michael J. Everett, individually and doing business as 1st Step Web Design and DiplomasAndMore.com, and David Schoettlin, individually and doing business as DocumentProfessionals.com, for a permanent injunction pursuant to Ind. Code § 24-5-0.5-4(c)(1), enjoining the Defendants from the following:

- a. Representing, expressly or by implication, the subject of a consumer transaction has sponsorship, approval, characteristics, accessories, uses, or benefits it does not have, which the Defendants know or reasonably should know it does not have;
- b. Representing, expressly or by implication, the subject of a consumer transaction is of a particular standard or quality, when it is not, and when the Defendants know or should reasonably know it is not; and
- c. Representing, expressly or by implication, the Defendants have a sponsorship, approval, or affiliation in such a consumer transaction they do not have, and which the Defendants know or should reasonably know they do not have such; and

- d. Selling or otherwise transferring the domain names, www.DiplomasAndMore.com and www.DocumentProfessionals.com, as well as any other domain names currently used by the Defendants in the commission of deceptive acts, to any third party.

AND WHEREFORE, the Plaintiff, State of Indiana, further requests the Court enter judgment against the Defendants, Michael J. Everett, individually and doing business as 1st Step Web Design and DiplomasAndMore.com, and David Schoettlin, individually and doing business as DocumentProfessionals.com, for the following relief:

- a. costs, pursuant to Ind. Code § 24-5-0.5-4(c)(3), awarding the Office of the Attorney General its reasonable expenses incurred in the investigation and prosecution of this action;
- b. on Count II of the Plaintiff's complaint, civil penalties, pursuant to Ind. Code § 24-5-0.5-4(g), for the Defendants' knowing violations of the Deceptive Consumer Sales Act, in the amount of Five Thousand Dollars (\$5,000.00) per violation, payable to the State of Indiana;
- c. on Count II of the Plaintiff's complaint, civil penalties, pursuant to Ind. Code § 24-5-0.5-8, for the Defendants' intentional violations of the Deceptive Consumer Sales Act, in the amount of Five Hundred Dollars (\$500.00) per violation, payable to the State of Indiana; and

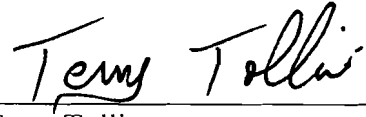
d. all other just and proper relief.

**I AFFIRM, UNDER THE PENALTIES OF PERJURY, THAT THE
FOREGOING REPRESENTATIONS ARE TRUE.**

Respectfully submitted,

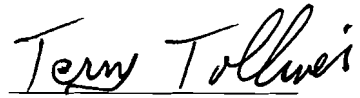
STEVE CARTER
Indiana Attorney General
Atty. No. 4150-64

By:


Terry Tolliver
Deputy Attorney General
Atty. No. 22556-49

CERTIFICATE OF SERVICE

The undersigned hereby certifies the Office of the Attorney General personally served a copy of the above Complaint upon the Defendants, Michael J. Everett and David A. Schoettlin, and a copy of the above Complaint was mailed by United States Mail, first class postage prepaid, to the Defendants, Michael J. Everett, 2038 North Wozniak Road, Michigan City, Indiana, 46360, and David A. Schoettlin, 4238 West Dunes Highway, Michigan City, Indiana, 46360-6654, all on this 22nd day of June, 2007.


Terry Tolliver

Office of Attorney General
302 W. Washington, 5th Floor
Indianapolis, IN 46204
Telephone: (317) 233-3300

Indiana University



By Authority of the Board of Trustees and Upon Recommendation
of the Faculty, Hereby Confer Upon

Kerria Hardwick

the degree of
Master of Business Administration
in recognition of the completion of the major in
Business Administration

In testimony Whereof the Undersigned Have Subscribed Their Names this Month of June, 2004.

Chairman of the Board of Trustees

Vice President for Academic Affairs



Dean of the College of Business

Secretary of the Board of Trustees

STATE'S
EXHIBIT
A

Blumberg No. 5138

Indiana University

Kelly School of Business

The Trustees of the University on recommendation of the Faculty
and by virtue of the authority vested in them
have conferred upon

Michael R. Ward

the degree of

Master of Business Administration

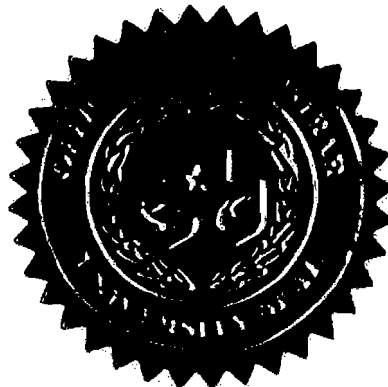
with a concentration in Business Administration


With all rights, privileges and honors pertaining to that degree.

Given at Indianapolis in the State of Indiana.

This twenty sixth day of May, two thousand six.


Chairman of the Board of Trustees




President of the University



INDIANA UNIVERSITY
KELLY SCHOOL OF BUSINESS
BLOOMINGTON, INDIANA



NAME: Michael R. Ward
 11432 BEAR HOLLOW CT, INDIANAPOLIS, IN
 DATE OF BIRTH: 07/21/1962
 ADMITTED AS GRADUATE STUDENT FALL 2004

STUDENT ID: 35381800
 CREDITS AWARDED: 39

SUBJECT	SUBJECT NAME	CR	GR	SUBJECT	SUBJECT NAME	CR	GR
YEAR 2004 FALL				*****			
BSNS	5215 ORGANIZATIONAL BEHAVIOR	3	A-	26-MAY-2006			
BSNS	5230 MANAGERIAL DECISION ANALYSIS	3	A	AWARDED THE DEGREE OF			
BSNS	5220 APPLIED MARKETING MANAGEMENT	3	A	MASTER OF BUSINESS ADMINISTRATION IN BUSINESS ADMINISTRATION			

				GRADUATE CUMULATIVE GPA: 3.85			

--- END OF RECORD ---

YEAR 2005		SPRING	
BSNS	5245 MANAGEMENT INFORMATION SYSTEMS	3	A-
BSNS	5205 ACCOUNTING PERFORMANCE, CONTROL ANALYSIS	3	A
BSNS	5225 FINANCIAL MANAGEMENT	3	A

YEAR 2005		FALL	
MGMT	5405 SELECTED TOPICS IN MANAGEMENT	3	A
MGMT	5407 ISSUES IN GLOBAL MANAGEMENT	3	A
MGMT	5325 PRACTICING BUSINESS ETHICS	3	A

YEAR 2006		SPRING	
ECON	5312 DOMESTIC AND GLOBAL ECONOMICS	3	B
MGMT	5343 LABOR-MANAGEMENT RELATIONS	3	A
MGMT	5340 UNDERSTANDING CORPORATE FRAUD	3	A-
PLAW	5605 ADVANCED TOPICS IN BUSINESS LAW	3	A



[Signature]
 UNOFFICIAL WITHOUT SIGNATURE
 MARY P. WESLEY, REGISTRAR

INDIANA UNIVERSITY

KELLY SCHOOL OF BUSINESS

TRANSCRIPT GUIDE

Official transcripts will bear the Registrar's signature and will be embossed with the Registrar seal. In accordance with the Family Educational Rights and Privacy Act of 1974, this record cannot be released to a third party without the written consent of the student.

UNIT CREDITS

Credits are expressed in quarter unity.

CALENDAR

Indiana University operates under the quarter system. Each quarter consists of 10 weeks of classes, plus one week for final exams.

GRADING SYSTEM

Grade points are a measure of the quality of the academic work completed just as quarter units are a measure of the quantity of academic work completed. The University uses a letter grade to indicate the level of individual student achievement. Each letter grade has a point value assigned for the grade achieved. The point value is as follows:

UNDERGRADUATE STUDENTS

Excellent Work

A	4.0 grade points
A-	3.7 grade points
B+	3.3 grade points

Good Work

B	3.0 grade points
B-	2.7 grade points

Satisfactory Work

C+	2.3 grade points
C	2.0 grade points

Below satisfactory work but acceptable

C-	1.7 grade points
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Unsatisfactory work, barely passing

D+	1.3 grade point
D	1.0 grade point

Failure, no credit

F	0
I	Incomplete (units are not counted in GPA)

GRADUATE STUDENTS

A	4.0 grade points for superior work
A-	3.7 grade points for very good work
B+	3.3 grade points for good work

B	3.0 grade points for satisfactory work
B-	2.7 grade points for marginal work

C+	2.3 grade points per unit for unsatisfactory work and barely passing
C	2.0 grade points per unit for unsatisfactory work and barely passing

C-	0.0 grade points per unit is not acceptable. The course must be repeated.
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D+	0.0 grade points per unit is not acceptable. The course must be repeated.
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W	No grade points are given when a student withdraws (units not counted)
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TRANSFER

Credits and grade points and credits earned at other colleges are not included in GPA calculations.

REPEAT COURSES

Any course may be repeated regardless of the letter grade earned. When a course is repeated, the higher grade will be used in computation of the grade point average and the other grade, while remaining on the transcript, will not be computed in the grade point average.